U.S. Environmental Protection Agency

Information Collection Request

TITLE: NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Proposed Rule)

OMB CONTROL NUMBER: 2060-0567

EPA ICR NUMBER: 2137.12

ABSTRACT: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) were proposed on May 3, 2011, and promulgated on February 16, 2012. The rule was subsequently amended on: March 24, 2015 (80 FR 15510); April 6, 2017 (82 FR 16736); April 15, 2020 (85 FR 20838); September 9, 2020 (85 FR 55744); and May 7, 2024 (89 FR 38508). This proposed amendment supersedes previous reporting requirements. These regulations apply to each individual or group of two or more new, reconstructed, or existing electric utility steam generating units (EGUs) within a contiguous area and under common control. An EGU is defined as a fossil fuel-fired combustion unit of more than 25 megawatts electric (MWe) that serves a generator that produces electricity for sale, or a fossil fuel-fired unit that cogenerates steam and electricity and supplies more than one-third of its potential electric output capacity and more than 25 MWe output to any utility power distribution system for sale. New facilities include those that commenced construction or reconstruction after May 3, 2011. This information is being collected to assure compliance with 40 CFR Part 63, Subpart UUUUU.

In general, NESHAP regulations typically require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction for each EGU, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of subpart UUUUU shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records.

The “Affected Public” are owners and operators of coal- and oil-fired EGUs. The ‘burden’ to the Affected Public may be found below in Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU), Table 1b: Annual Respondent Burden and Cost for Public Facilities – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) and Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU).

There are approximately 372 coal- or oil-fired EGUs, which are owned and operated at 192 electric utilities. This estimate is based on adjustments for the shutdown and conversion of existing solid fuel-fired (specifically coal-fired) units to gas-fired units since promulgation of the final rule in 2012. Based on the 2012 final rule, approximately 16.7 percent of facilities (32 facilities) are owned by either state, local, or tribal governments.[1] The remaining 83.3 percent (160) facilities are owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to all EPA inquiries.

Based on our consultations with industry representatives, there are an average of 1.9 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site). Over the next three years, approximately 192 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate is based on industry trends that suggest that no new fossil fuel-fired EGUs will be constructed in the near future due to low electricity demand growth, competitive natural gas prices, and increases in the supply of renewable energy.

There are no new sources expected at this time. Based on the previous ICR, 62 percent of EGUs were using PM continuous parameter monitoring systems (CPMS) or stack testing to comply with the PM standard and 38 percent of EGUs were using PM continuous emissions monitoring systems (CEMS) to comply.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

> (A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

[1] The 2012 rule identified 575 facilities, of which 96 facilities (or approximately 16.7% of all sources) were owned by "state, municipal, and political subdivisions". See *Regulatory Impact Analysis for the Final Mercury and Air Toxics Standards*, EPA-452/R-11-011, December 2011.

In the Administrator's judgment, hydrochloric acid (HCl), mercury (Hg), non-Hg metal hazardous air pollutants (HAP), and organic HAP emissions from coal-fired EGUs and HCl, hydrogen fluoride (HF), non-HG metal HAP, and organic HAP from oil-fired EGUs either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart UUUUU.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required to determine an affected facility's initial capability to comply with the emission standards. Continuous monitoring systems (CMS) may be used to ensure compliance with these same standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor. Periodic stack testing may also be used to demonstrate ongoing compliance.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. Most emissions and monitoring information in the reports are reported in an electronic format using the Electronic Reporting Tool (ERT). The data will be extracted from the ERT files and can be viewed through EPA's Central Data Exchange. At this time, it is estimated that approximately 100 percent of the respondents use electronic reporting.

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. During rule development, EPA conducted a regulatory impact analysis and concluded that the rule does not have a significant economic impact on small entities. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

The proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

These standards require the respondents to maintain all records, including reports and notifications, for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The

retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

EPA is submitting this proposed rule for public consideration. Comments received during the proposed rule comment period will be considered as the Agency develops its final rule.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information was the EPA's National Electric Energy Data System version 6 (NEEDS v.6) (see https://www.epa.gov/power-sector-modeling/national-electric-energy-data-system-needs). The growth rate for the industry is based on our consultations with the Agency's internal industry experts and excludes planned retirements and gas conversions. Approximately 192 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. Further stakeholder and public input is expected through public comment and follow-up meetings with interested stakeholders.

It is our policy to respond after a thorough review of comments received since the last ICR renewal. No comments have been received.

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are owners or operators of fossil fuel-fired EGUs. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 4911 (Electric Services) which corresponds to the North American Industry Classification System (NAICS) 221100 (Electric Power Generation, Transmission, and Distribution).

Based on our research for this ICR, on average over the next three years, approximately 372 units at 192 existing facilities will be subject to these standards. It is estimated that no additional respondents will become subject to these same standards in the next three years. The overall average number of respondents, as shown in the table below, is 192 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	**(A) Number of New Respondents** [1]	**(B) Number of Existing Respondents** [2]	**(C) Number of Existing Respondents that keep records but do not submit reports**	**(D) Number of Existing Respondents That Are Also New Respondents**	**(E) Number of Respondents (E=A+B+C-D)**
1	0	192	0	0	192
2	0	192	0	0	192
3	0	192	0	0	192
Average	**0**	**192**	**0**	**0**	**192**

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

[2] Includes both public and private facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 192.

The total number of average annual responses per year is calculated using the following table:

Total Annual Responses (Three Year Average)				
(A) Information Collection Activity	**(B) Number of Respondents**	**(C) Number of Responses per year**	**(D) Number of Respondents That Keep Records But Do Not Submit Reports**	**(E) Total Annual Responses E=(BxC)+D**
Existing Sources				
Notification of CEMS demonstration	0	1	0	0
Notification of initial performance test	0	1	0	0

Performance test report	383	1	0	383
Notification of compliance status	0	1	0	0
Quality assurance program certification	0	1	0	0
Startup, shutdown, and malfunction report (10% of respondents)	37	1	0	37
Semiannual compliance report	372	2	0	744
Site-specific performance evaluation test plan	372	1	0	372
Request to use alternative monitoring procedure (10% of respondents)	37	1	0	37
New Sources				
Initial notification	0	1	0	0
Notification of CEMS demonstration	0	1	0	0
Notification of initial performance test	0	1	0	0
Performance test report	0	1	0	0
Notification of compliance status	0	1	0	0
Quality assurance program certification	0	1	0	
Startup, shutdown, and malfunction report (10% of respondents)	0	1	0	0
Semiannual compliance report	0	2	0	0
Site-specific performance evaluation test plan	0	1	0	0
Request to use alternative monitoring procedure (10% of respondents)	0	1	0	0
Average Annual Responses				**1,574**

The number of Total Annual Responses is 1,574.

The total annual labor costs are approximately $22,800,000 for private facilities and $1,700,000 for public facilities. Details regarding these estimates may be found below in Table 1a and Table 1b, and the summary information may be found below in Table 1c.

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU).

A source must make the following reports:

Notifications	
Initial notification	§ 63.5(b)(4), § 63.5(d)(1), § 63.9(b), §§ 63.10030(a-c)
Notification of performance test/evaluation	§ 63.7(b), § 63.7(c), § 63.8(e),

Notifications	
	§ 63.8(f)(4), § 63.8(f)(6), § 63.9(g)(1), §§ 63.10030 (a and d)
Notification of compliance status	§ 63.7(g), § 63.9(h), § 63.10030(a), § 63.10030(e), § 63.10005(k), § 63.10011(e)
Notification of the date the source intends to commence or recommence operations in a manner that meet the definition of an EGU	§ 63.10030(f), § 63.10000(h)(2)
Notification of the date the source ceases to operate in a manner that meets the definition of an EGU	§ 63.10030(f), § 63.10000(i)(2)
Request to use alternative monitoring procedure	§ 63.8(f)

Reports	
Excess emissions	§ 63.10(e)(3), § 63.10021(g), §§ 63.10031(a and d)
Performance test/evaluation results	§ 63.8(e)(5), § 63.10(d)(2), § 63.10(e)(2), § 63.10031(f)
Startup/shutdowns periods and activities	§ 63.10011(g), § 63.10021(i)
Semi-annual compliance report	§§ 63.10031(a and c)
Site-specific test plan	§ 63.7(c), § 63.10000(c)(2), § 63.10000(d)(1), § 63.10007(a)
Dates of tune-ups	§ 63.10021(e)

A source must keep the following records:

Recordkeeping	
Notifications and reports	§ 63.10032(a)(1)
CMS tests, measurements, malfunctions, maintenance, exceedances	§ 63.7(g)(3), §§ 63.10(b)(2)(iii and vi-ix), § 63.10(c), § 63.10007(g), § 63.10032(a)(2), §§ 63.10032(b and c)
Monthly fuel use	§ 63.10032(d)(1)
Documentation showing that criteria are satisfied for non-hazardous secondary materials	§ 63.10032(d)(2)
Documentation showing continued qualification as a low emitting EGU (LEE)	§ 63.10032(d)(3)
Emissions averaging implementation plan (only for sources electing to average emissions)	§ 63.10032(e)

Recordkeeping	
Startups and shutdowns	§ 63.10021(h), §§ 63.10032(f and i)
Malfunction periods and corrective actions taken to restore normal operation	§§ 63.10032(g and h)
Quarterly fuel use (only for sources qualifying as limited-use liquid oil-fired EGUs)	§ 63.10032(j)
Tune-up records (only for sources that conducted tune-ups prior to April 16, 2012)	§ 63.10005(f)

12c. RESPONDENT ACTIVITIES

Respondent activities listed here:

- Familiarization with the regulatory requirements.
- Install, calibrate, maintain, and operate CMS for filterable PM, HCl, HF, or Hg.
- Perform initial performance test, Reference Methods 5, 5I, 6A, 19, 26, 26A, 29, 30B, or 320 tests, and repeat performance tests if necessary.
- Write the notifications and reports listed above.
- Enter information required to be recorded above.
- Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
- Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
- Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
- Train personnel to be able to respond to a collection of information.
- Transmit, or otherwise disclose the information.

The specific frequency for each information collection activity within this request is shown below in Table 1a, Table 1b, and Table 1c.

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 181,000 hours (Total Labor Hours from Table 1a and Table 1b below; see also the summary of burden in Table 1c). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

For private facilities, this ICR uses the following hourly labor rates:

Managerial $181.99 (Management, professional, and related: Professional and related, $86.66 + 110%)

Technical	$157.25 (Management, professional, and related: Management, business and financial, $74.88 + 110%)
Clerical	$75.31 (Sales and office: Office and administrative support), $35.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation" (https://www.bls.gov/news.release/ecec.t02.htm). The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

For public facilities, this ICR uses the following hourly labor rates:

Managerial	$76.91 (GS-13, Step 5, $48.07 + 60%)
Technical	$57.07 (GS-12, Step 1, $35.67 + 60%)
Clerical	$30.88 (GS-6, Step 3, $19.30 + 60%)

These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality rates of pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf). The hourly basic rates have been increased by 60 percent to account for the benefit packages available to government employees.

The total annual labor hours are 181,000 hours. Details regarding these estimates may be found below in Table 1a and Table 1b and summarized in Table 1c.

We assume that burdens for managerial tasks take 5 percent of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual respondent reporting and recordkeeping burden for this collection of information is estimated to average 115 hours per response.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. These include the costs to conduct the initial performance tests for each EGU and startup costs for each CMS. The capital/startup costs are one-time costs when a facility becomes subject to the regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs—Private Facilities (Three Year Average)			
(A) **Pollutant**	**(B)** **Capital/Startup Cost for One Respondent**	**(C)** **Number of Existing Respondents**	**(D)** **Total Capital/Startup Cost, (B X C)**
Performance Testing			
PM - Method 5[b]	$5,167	192	$992,761
HCl - Method 320[b]	$20,444	53	$1,077,038
Hg - Method 30B[b]	$20,006	74	$1,487,929
CEMS Installation & Operation			
PM[c]	$7,941	0	$0
HCl	$111,045	0	$0
Hg	$174,002	0	$0
Total			**$3,557,727**

Average Annual Operation and Maintenance (O&M) Costs (Three Year Average-Private)						
CEM	**Costs per Monitor**				**Number of Monitors**	**Total Annual Cost**
	Labor	**Testing**	**ODC's**	**Total**		
PM[d]	$0	$14,290	$13,693	$27,983	118	$3,295,251
HCl[e]	$14,789	$10,932	$15,897	$41,618	257	$10,704,557

Hg[f]	$19,959	$40,012	$40,035	$100,006	236	$23,553,232
Total						**$37,553,039**

[a] Based on the average number of privately-owned units over the three-year period of the ICR.

[b] Estimates are based on the number of privately-owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGUs conducting Method 5 testing, 53 EGUs conducting Method 320 testing, and 74 EGUs conducting Method 30B testing. Method 5 costs are based on $47,061 annualized for 15 years at 7% interest.

[c] PM CEMS costs are based on $72,325 annualized for 15 years at 7% interest.

[d] 118 PM CEMS per year at privately-owned facilities will have O&M costs.

[e] 257 HCl CEMS per year at privately-owned facilities will have O&M costs.

[f] 236 Hg CEMS per year at privately-owned facilities will have O&M costs.

Capital/Startup vs. Operation and Maintenance (O&M) Costs—Public Facilities (Three Year Average)			
(A) Pollutant	**(B) Capital/Startup Cost for One Respondent**	**(C) Number of Existing Respondents**	**(D) Total Capital/Startup Cost, (B X C)**
Performance Testing			
PM - Method 5[b]	$5,167	39	$198,967
HCl - Method 320 [b]	$20,444	11	$215,857
Hg - Method 30B [b]	$20,006	15	$298,207
CEMS Installation & Operation			
PM[c]	$7,941	0	$0
HCl	$111,045	0	$0
Hg	$174,002	0	$0
Total			**$713,031**

Average Annual Operation and Maintenance (O&M) Costs (Three Year Average – Public)						
CEM	**Costs per Monitor**				**Number of**	**Total Annual Cost**
	Labor	**Testing**	**ODC's**	**Total**		

					Monitors	
PM[d]	$0	$14,290	$13,693	$27,983	24	$660,426
HCl	$14,789	$10,932	$15,897	$41,618	52	$2,145,381
Hg	$19,959	$40,012	$40,035	$100,006	47	$4,720,481
Total						**$7,526,288**

[a] Based on the average number of publicly owned units over the three-year period of the ICR.

[b] Estimates are based on the number of publicly owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 39 EGUs conducting Method 5 testing, 11 EGUs conducting Method 320 testing, and 15 EGUs conducting Method 30B testing. Method 5 costs are based on $47,061 annualized for 15 years at 7% interest.

[c] PM CEMS costs are based on $72,325 annualized for 15 years at 7% interest.

[d] 24 PM CEMS per year at publicly-owned facilities will have O&M costs.

[e] 52 HCl CEMS per year at publicly-owned facilities will have O&M costs.

[f] 47 Hg CEMS per year at publicly-owned facilities will have O&M costs.

The total capital/startup average annual costs for this ICR are approximately $3,600,000 for private facilities and $700,000 for public facilities.

The total operation and maintenance (O&M) average annual costs for this ICR are approximately $37,600,000 for private facilities and $7,500,000 for public facilities.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $41,200,000 for private facilities and $8,200,000 for public facilities.

The total annual capital/startup and O&M costs to the regulated entity are $49,400,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports,

Agency Activities
required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

14b. Agency Burden and Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $401,000.

This cost is based on the average hourly labor rates as follows:

Managerial	$76.91 (GS-13, Step 5, $48.07 + 60%)
Technical	$57.07 (GS-12, Step 1, $35.67 + 60%)
Clerical	$30.88 (GS-6, Step 3, $19.30 + 60%)

These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality rates of pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf). The hourly basic rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2.

The average annual Agency burden and cost over next three years is estimated to be 7,210 labor hours at a cost of **$401,000**; see below in Table 2.

We assume that burdens for managerial tasks take 5 percent of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

14d. Agency Total Costs

The average annual Agency burden and cost over next three years is estimated to be 7,210 labor hours at a cost of $401,000.

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The change in affected unit counts occurred due to more accurate estimates of existing sources, updates to labor rates, and the removal of the requirement to use PM CEMS to demonstrate compliance with the PM emissions standard. This ICR, by in large, reflects the on-going burden and costs for existing sources; there are no new sources anticipated for the period of this ICR. Activities for existing sources include the continuous monitoring of pollutants and the submission of semiannual reports. Revisions to account for these changes in activity also reduce the estimated number of responses. The overall result is a decrease in burden hours and labor costs.

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date on for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

able 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Three Year Average)

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with Regulatory Requirements	1	1	1	160	160	8.0	16.0	27,811
B. Required activities								
Existing sources								
Annual performance test (PM, Methods 5 and 202) [c]	27.8	1	27.8	192	5,341	267	534	928,734

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Annual performance test (HCl, Method 320) [c]	26.4	1	26.4	53	1,391	70	139	241,829
Annual performance test (Hg, Method 30B) [c]	27.8	1	27.8	74	2,068	103	207	359,510
CEMS quarterly inspections [d]	2.5	4	10	257	2,572	129	257	447,232
CEMS daily calibration drift tests [d]	0.4	365	146	257	37,553	1,877.6	3,755.3	6,529,590
CEMS daily monitoring [d]	0.25	365	91.25	257	23,470	1,173.52	2,347.0	4,080,994
All CEMS must follow appropriate performance specifications [d]	14	1	14	257	3,601	180.0	360.1	626,125
New Sources								
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test	26.4	1	26.4	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
(HCl, Method 320)								
Initial performance test (Hg, Method 30B)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	31.0	310	15.5	31.0	53,883
Semiannual compliance report	65	2	130	310	40,286	2,014	4,029	7,004,842
Site-specific performance evaluation test plan	20	1	20	310	6,198	310	620	1,077,668

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	31	155	8	15	26,942
New sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction	10	1	10	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
report (10% of respondents)								
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0	0	0	0	0
Subtotal for Reporting Requirements					140,000			21,405,161
5. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	31	372	18.6	37.2	64,660
Records of startups, shutdowns, malfunctions, etc.	1	12	12	31	372	18.6	37.2	64,660
Records of monthly fuel use	2	12	24	310	7,437	371.9	743.7	1,293,202
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					9,400			$1,422,522
TOTAL LABOR BURDEN AND COST (ROUNDED)c					149,400			$22,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED)c								$41,100,000
GRAND TOTAL (ROUNDED)c								$64,000,000

Footnotes:

[a] EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 83.3% are privately-owned.
83.3% of 192 facilities are private facilities = 160.

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]

83.3% of 372 units are at private facilities = 310 units; 62% of 310 units had PM CPMS or conducted PM stack tests each year = 192.
The remaining 118 units had PM CEMS.

[b] This ICR uses the following hourly labor rates: $157.25 (technical), $181.99 (managerial), and $75.31 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." https://www.bls.gov/news.release/ecec.t02.htm. They have been increased by 110 percent to account for benefit packages.

[c] Estimates are based on the number of privately-owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGUs conducting Method 5 testing, 53 EGUs conducting Method 320 testing, and 74 EGUs conducting Method 30B testing.

[d] Assumes that 309 EGUs use HCl or SO_2 CEMs and 83.3% of those are privately-owned = 257.

[e] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 1b: Annual Respondent Burden and Cost for Public Facilities – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Three Year Average)

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with Regulatory Requirements	1	1	1	32	32	1.6	3.2	2,052
B. Required activities								
Existing sources								

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Annual performance test (PM, Methods 5 and 202)[c]	27.8	1	27.8	39	1,070	54	107	68,517
Annual performance test (HCl, Method 320) [c]	26.4	1	26.4	11	279	14	28	17,841
Annual performance test (Hg, Method 30B) [c]	27.8	1	27.8	15	414	21	41	26,523
CEMS quarterly inspections [d]	2.5	4	10	52	515	26	52	32,995
CEMS daily calibration drift tests [d]	0.4	365	146	52	7,526	376.3	752.6	481,721
CEMS daily monitoring [d]	0.25	365	91.25	52	4,704	235.19	470.4	301,075
All CEMS must follow appropriate performance specifications [d]	14	1	14	52	722	36.1	72.2	46,192
New sources								

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 30B)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	6	62	3.1	6.2	3,975
Semiannual compliance report	65	2	130	62	8,074	404	807	516,782
Site-specific performance evaluation test plan	20	1	20	62	1,242	62	124	79,505
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	6	31	2	3	1,988
New Sources								
Initial notification	3	1	3	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0	0	0	0	0
Subtotal for Reporting Requirements					28,000			1,579,166
5. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	6	75	3.7	7.5	4,770
Records of startups, shutdowns, malfunctions, etc.	1	12	12	6	75	3.7	7.5	4,770
Records of monthly fuel use	2	12	24	62	1,491	74.5	149.1	95,406
New Sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	0

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***1,900***			$105,000
TOTAL LABOR BURDEN AND COST (ROUNDED)[c]					***29,900***			$1,700,000
TOTAL CAPITAL AND O&M COST (ROUNDED)[c]								$8,200,000
GRAND TOTAL (ROUNDED)[c]								$9,900,000

Footnotes:

[a] EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 16.7% are public.

16.7% of 192 facilities are public facilities = 32. 16.7% of 372 units at public facilities = 62; 62% of 62 units had PM CPMS or

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]

conducted PM stack tests each year = 39. The remaining 24 units had PM CEMS.

[b] This ICR uses the following labor hourly rates: $57.07 (technical), $76.91 (managerial), and $30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

[c] Estimates are based on the number of publicly owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 39 EGUs conducting Method 5 testing, 11 EGUs conducting Method 320 testing, and 15 EGUs conducting Method 30B testing.

[d] Assumes that 309 EGUs use HCl or SO_2 CEMs and 16.7% of those are public = 52.

[e] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Three Year Average)

Affected Sector	Number of Responses	Labor Hours			Labor Cost	Capital	O&M Cost	Total Cost
		Reporting	Recordkeeping	Total				

Private	1,311	142,000	9,400	149,400	$22,800,000	$3,600,000	$37,600,000	$63,900,000
Public (State/Local/Tribal)	263	28,400	1,900	29,900	$1,700,000	$700,000	$7,500,000	$9,900,000
Total (rounded)	1,574	170,000	11,300	179,300	$24,500,000	$4,300,000	$45,000,000	$73,800,000

Current Inventory				
Total # of facilities:	**192**	**Total # of EGU units:**	**372**	**% by sector**
Total private sector	160	Total private sector	310	83.3%
Total public sector	32	Total public sector	62	16.7%

Table 2: Average Annual EPA Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Three Year Average)

Burden Item	A Technical person-hours per occurrence	B No. of occurrences per respondent per year	C Technical person-hours per respondent per year (AxB)	D Respondents per year [a]	E Technical hours per year (CxD)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H Total cost per year ($) [b]
Observe initial performance test [c]	24	1	24	0	0	0	0	0
Observe repeat performance test [d]	24	0.2	4.8	0	0	0	0	0
Review initial notification	0.5	1	0.5	0	0	0	0	0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	0
Review performance test report	8	1	8	0	0	0	0	0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	37	298	14.88	29.76	19,048
Review semiannual compliance report	8	1	8	372	2,976	148.8	297.6	190,481

Review notification of compliance status	0.5	1	0.5	0	0	0	0	0
Review site-specific performance evaluation test plan	8	1	8	372	2,976	149	298	190,481
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	37	19	1	2	1,191
Travel Expenses [e]								0
TOTAL (ROUNDED) [f]					**7,210**			**$401,000**

Footnotes:

[a] EPA estimates 372 existing EGUs will be subject to the NESHAP each year.

[b] This ICR uses the following hourly labor rates: $57.07 (technical), $76.91 (managerial), and $30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

[c] EPA estimates it will observe 20% of initial performance tests.

[d] EPA assumes 20% of initial performance tests must be repeated due to failure.

[e] EPA estimates annual travel expenses to be $400 per plant for initial performance test observations.

[f] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.